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Attorney for Cyrus Sullivan

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
CYRUS SULLIVAN.  
  
Defendant.

3:13-CR-00064-HZ  
3:14-CR-00190-HZ

UNOPPOSED MOTION TO  
CONTINUE SUPERVISED  
RELEASE REVOCATION  
HEARINGS

I, Tiffany A. Harris, declare the following to be true to the best of my knowledge:

1. On March 1, 2017, pursuant to 18 U.S.C. § 3006A(e)(2)(the Criminal Justice Act), I was appointed to represent Mr. Sullivan in two cases that had been consolidated for hearings on alleged violations of Mr. Sullivan's supervised release.

2. At a status hearing on March 3, 2017, the parties conferred and scheduled a contested hearing for April 17, 2017 at 2:00 p.m.

3. On March 29, 2017, in preparation for the hearing, the defense served the Probation Department with a letter outlining specifically enumerated requests for discovery.

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4. On April 7, 2017, the Government responded to defense counsel's letter and requested ten days to process the requested discovery. The Government also informed defense counsel that the Probation Officer was scheduled for surgery and would be recovering on the date of the previously scheduled hearing—April 17, 2017.

5. The parties have since been negotiating the terms of a protective order that the Government believes is necessary in order to complete the discovery process.

6. Therefore, the defense makes this motion for a continuance without objection from the Government or Probation Department. Defense counsel has conferred with Mr. Sullivan, who also supports the requested continuance. The defense requests that the hearing, currently scheduled for April 17, 2017 be continued to May 11<sup>th</sup>, 12<sup>th</sup> or 15<sup>th</sup>, or a date thereafter, convenient for the court or counsel.

I declare under penalty of perjury that the forgoing is correct to the best of my knowledge and belief.

DATED this 14th day of April, 2017.

Respectfully submitted,

/S/ Tiffany Harris

Tiffany A. Harris  
Attorney for Defendant Cyrus Sullivan